Dear SEC Staff and Gary Gensler,

I am reaching out today, November 28th, 2021, to outline a few data points I believe should 100% be required in the Proposed Rule S7-18-21, regarding Securities Loans reporting. These are all points of information that should be available to ALL participants. I have included a brief explanation of each with applicable details.

# - Legal first/last name of Lender:

Basic personal details should be provided in a public database about a Lender, so investors know who is lending securities and why they may be inclined to do so.

### - Legal first/last name of Borrower:

Basic personal details should be provided in a public database about a Borrower, so investors know who is borrowing securities and why they may be inclined to do so. In the case of the Borrower, are they anticipating a price drop in the securities in question? If so, this is information that would allow an investor to make an educated guess on a Borrower's intentions with those securities.

### - Lender affiliation:

Who is the Lender working for/with? Is the Lender aware of the borrower's intentions?

#### - Borrower affiliation:

Who is the Borrower working for/with? What might their intentions be with the borrowed securities in question? Without spoiling a Borrower's investment strategy by publicising their exact motives behind a trade, how can proper information be provided to all participants that allows them to make accurate predictions on potential motives of the Borrower?

#### - Ticker symbol:

This is potentially the single most important data point. It is crucial that regulators AND retail investors have access to which ticker symbols or their derivatives are included in a securities loan.

#### - Order size:

Simply providing data on who is lending to who, and what stock they are lending is not sufficient enough. Specifics regarding the number of shares or contracts lent must be transparent for all participants, as it is crucial for investors to be able to keep track of the % of a stock's float on loan. This can help provide a more accurate reading on other metrics, such as short interest and float ownership.

#### - Time & date of transaction:

An exact timestamp and date metric of when a transaction takes place is necessary to properly keep record of all transactions.

## Name of host venue/platform:

Is the transaction hosted by a broker, Market Maker, or exchange? Is there any benefit to the host platform involved in the execution of the loan transaction? Is this venue engaged in a PFOF agreement?

### - Rates, fees, charges for borrowing:

What are the included charges and ongoing rates to maintain a loan of securities? What happens if a Borrower fails to pay fees to maintain the loan? Are there conditions in which a rate increase would occur, and how would said increase be reported to an agency who could then make it public for all participants?

### - Specifics on posted collateral:

What type of collateral has been provided as security to the Lender of securities? What percentage of the total loan value is matched with collateral? Are there terms for adjusting collateral requirements, and how can all market participants be notified of such changes in real-time? For example, how will retail investors be notified if a Borrower of Stock Z gets margin called and is required to post more collateral? This kind of information is make or break when talking about investors wanting to make the most informed decisions possible.

### - Required termination date of loan:

As far as I know, securities loans do not require an initial termination date, so long as all fees/charges are accounted for and the Lender is willing to allow the loan to remain. Is it possible for all loans to be assigned a termination date, even far in advance? If not, loans WITH termination dates must have them made public, so investors are able to foresee the potential for market volatility. For example, if Investor A sees that Borrower A has 30 days until their loan on shares of Stock Z terminates, Investor A can assume that Borrower A may be looking to close a short position near or on the termination date. Verification of the accuracy of this information would indicate to Investor A whether they should decrease/close their position to avoid volatility, or increase their position to take advantage of a potential short squeeze.

# Accuracy of Self-Reported Metrics:

None of the required metrics regarding securities loans carry any weight or value if they are inaccurate. Currently, the issue is that these data are not available to all participants. This is for a reason: they provide the Smart Money with behind-the-scenes advantages that others do not have. To avoid losing these advantages, participants may resort to falsely reporting metrics that could hurt them if they were to be reported truthfully. In the event of suspected book-cooking, how will the SEC or another regulatory agency enforce the reporting of accurate information? What penalties will be put in place if a participant were to get caught falsely reporting information that affects market sentiment as a whole?

After speaking with a sweet woman by the name of Tonia Tornatore this past Friday, the 26th, i realized that there have been minimal comments posted on this Proposed Rule for Securities Lending. I am well-aware that a large subset of the retail investor community has strong opinions regarding this issue, yet very few comments have actually made their way to the SEC's inbox. I have submitted this document today to summarize what I have discussed with my peers, and to hopefully give the SEC a deeper look into how these non-transparent regulations may be fueling larger problems within our U.S. Markets. Issues such as Payment for Order Flow, naked short-selling, and dark exchange/pool abuse also surface regularly within the community. I, along with other fellow retail investors, believe that more transparency in the securities lending space would do a great deal of good in drying up these ancient practices that only enable privileged participants to always come out on top.

I believe the SEC will do its due diligence to tighten up regulations surrounding Reporting on Securities Loans, especially considering the recent events from this year around "meme stocks", which were fueled by overleveraged short positions and vague details on how/why shares of the companies in question were loaned out to allow for such large short positions. I appreciate you taking the time to read through this outline, and I hope to be trading in a better, safer, smarter, and more transparent market in the near future. I also appreciate Tonia Tornatore for encouraging me to submit these comments, and for speaking with me in-depth on some of the concepts provided in this note. Thank you!

Sincerely, David Dzujna Retail Investor